Aladdin Knowledge Systems, Ltd.,

Plaintiff,

v.

CIVIL ACTION NO. 05-149 (GMS)

Feitian Technologies Co., Ltd., et al.,

Defendants.

EXHIBIT L

(Feitian's 1/2/03 e-mail re: strategic importance of U.S. market)

Aladdin Knowledge Systems, Ltd.,

Plaintiff,

7.

CIVIL ACTION NO. 05-149 (GMS)

Feitian Technologies Co., Ltd., et al.,

Defendants.

.

EXHIBIT M

(Feitian's 1/16/03 e-mail re: goal of opening U.S. office)

Aladdin Knowledge Systems, Ltd.,

Plaintiff,

v.

CIVIL ACTION NO. 05-149 (GMS)

Feitian Technologies Co., Ltd., et al.,

Defendants.

EXHIBIT N

(3/11/03 Distribution Agreement (Rockey); Feitian/RF Ideas e-mails regarding Coding Contract and Distribution Agreement)

Aladdin Knowledge Systems, Ltd.,

Plaintiff,

v.

CIVIL ACTION NO. 05-149 (GMS)

Feitian Technologies Co., Ltd., et al.,

Defendants.

EXHIBIT O

(7/26/04 Distributor's Coding Program License Agreement)

Aladdin Knowledge Systems, Ltd.,

Plaintiff,

v.

CIVIL ACTION NO. 05-149 (GMS)

Feitian Technologies Co., Ltd., et al.,

Defendants.

EXHIBIT P

Aladdin Knowledge Systems, Ltd.,

Plaintiff,

CIVIL ACTION NO. 05-149 (GMS)

٧.

Feitian Technologies Co., Ltd., et al.,

JURY TRIAL DEMANDED

Defendants.

DECLARATION OF RICK LANDUYT OF R.F. IDEAS, INC. d/b/a SECURITY TOKENS IN SUPPORT OF PLAINTIFF'S SUPPLEMENTAL RESPONSE IN OPPOSITION TO MOTION TO DISMISS OF DEFENDANT FEITIAN TECHNOLOGIES, CO., LTD.

RICK LANDUYT, under penalty of perjury, hereby declares as follows:

- 1. I am over the age of eighteen and a citizen of the United States. I have personal knowledge of the information contained in this Affidavit and can testify as to the information if necessary.
- 2. I am the President and principal shareholder of Defendant RF IDeas, Inc., d/b/a Security Tokens ("RF IDeas").
- 3. RF IDeas was incorporated in Delaware on April 17, 1995 and has at all times maintained its active status as a Delaware corporation. RF IDeas' principal place of business is located as 4238 B Arlington Heights Road, Arlington Heights, IL 60004.
- 4. RF IDeas began discussing the possibility of acting as Feitian's U.S. distributor with Feitian in late 2002 and engaged in negotiations for the terms of the parties' Distribution Agreement dated March 11, 2003, that was executed on behalf of RF IDeas in Arlington Heights, Illinois.

Filed 11/20/2006

- As a result of the execution of the Distribution Agreement with Feitian, RF IDeas 5. became a U.S. distributor for Feitian's products. Among the products RF IDeas was authorized to distribute for Feitian were its ePass and Rockey products. As a U.S. distributor, RF IDeas was authorized to distribute Feitian's products anywhere in the United States.
- All communications with Feitian, pre-execution of the Distribution Agreement 6. and as the U.S. distributor for Feitian, occurred principally by electronic mail and occasionally by telephone from or to RF IDeas' offices in Arlington Heights, Illinois or Chicago, Illinois.
- All sales of Feitian products that were made by RF IDeas were shipped by Feitian 7. to our offices in Arlington Heights, Illinois or to Shiung Lo in Chicago, Illinois. For a limited period of time some shipments were also made to an office we then had in Cary, Illinois. RF IDeas would then ship the products to the customer in the United States or Canada. The United States customers included residents of Illinois and California. Occasionally, Feitian shipped the product directly to the customer.
- RF IDeas paid Feitian for the products it purchased, and for the shipping costs 8. Feitian required reimbursement for, by wire transfer from our bank in Illinois to Feitian's bank in Beijing, China, in accordance with Feitian's instructions.
- During the time it acted as the U.S. distributor for Feitian's products, including its ePass and Rockey products, from approximately August 2003 until the Distribution Agreement was terminated in May 2005 as a result of RF IDeas' settlement with Aladdin Knowledge Systems, Ltd., the principal persons responsible for the Feitian business were myself, Thomas Crowley, Ron Fielder, Greg Gliniecki, Matt Winter and Shiung Lo. Shiung Lo was located in his own Chicago office.
 - I am a resident of Arlington Heights, Illinois, located in the Chicago area. 10.

- Upon information and belief, Thomas Crowley, Greg Gliniecki, Matt Winter and Shuing Lo are all residents of Illinois, in and around the Chicago area. Ron Fielder is located in Florida.
- 12. Messrs. Crowley, Messrs. Winter, and Messrs. Lo were never employed by RF IDeas, Inc. They worked as an independent contractor or representative. It is my understanding that they are located in the Chicago, Illinois area. Messrs. Fielder and Messrs. Gliniecki are employed by RF IDeas.
- 13. It would be most convenient for each of us if we have to testify in this patent infringement action, if the matter were heard in the District Court located in Chicago, Illinois.
- properly issued subpoena in this action. Aladdin served RF IDeas with a document subpoena. In view of the Distribution agreement with Feitian, RF IDeas required that Aladdin execute a Non-Disclosure and Confidentiality Agreement before it would produce any materials in response to the subpoena. Aladdin executed the Non-Disclosure and Confidentiality Agreement and thereafter RF IDeas produced all responsive materials in its possession to Aladdin. RF IDeas initially took the position that Aladdin could not produce these responsive materials, marked "SECRET," to Feitian unless Feitian would execute the same Non-Disclosure and Confidentiality Agreement. Following negotiations among counsel for RF IDeas, Aladdin and Feitian, RF IDeas agreed to allow the production of the documents to Feitian upon the entry of the parties' Stipulated Protective Order. The Stipulated Protective Order was approved by the Court on October 12, 2006.

Ruhe and 11/15/2006 Rick Landuyt

Aladdin Knowledge Systems, Ltd.,

Plaintiff,

v.

CIVIL ACTION NO. 05-149 (GMS)

Feitian Technologies Co., Ltd., et al.,

Defendants.

EXHIBIT Q

(Feitian's 5/26/04 e-mail re: shipment of leased equipment to RF Ideas)

Aladdin Knowledge Systems, Ltd.,

Plaintiff,

v.

CIVIL ACTION NO. 05-149 (GMS)

Feitian Technologies Co., Ltd., et al.,

Defendants.

EXHIBIT R

(Feitian's e-mails re: termination of RF Ideas' Distribution Agreement)

Aladdin Knowledge Systems, Ltd.,

Plaintiff,

v.

CIVIL ACTION NO. 05-149 (GMS)

Feitian Technologies Co., Ltd., et al.,

Defendants.

EXHIBIT S

(Feitian/RF Ideas' e-mails re: telephone calls)

Aladdin Knowledge Systems, Ltd.,

Plaintiff,

v.

CIVIL ACTION NO. 05-149 (GMS)

Feitian Technologies Co., Ltd., et al.,

Defendants.

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EXHIBIT T

(Feitian/RF Ideas' e-mail re: wire transfers)

Aladdin Knowledge Systems, Ltd.,

Plaintiff,

v.

CIVIL ACTION NO. 05-149 (GMS)

Feitian Technologies Co., Ltd., et al.,

Defendants.

EXHIBIT U

(Feitian's e-mails re: U.S. marketing efforts)

Aladdin Knowledge Systems, Ltd.,

Plaintiff,

v.

CIVIL ACTION NO. 05-149 (GMS)

Feitian Technologies Co., Ltd., et al.,

Defendants.

EXHIBIT V

(Feitian's 11/8/04 e-mail re: website redesign and leads for distributors)

Aladdin Knowledge Systems, Ltd.,

Plaintiff,

v.

CIVIL ACTION NO. 05-149 (GMS)

Feitian Technologies Co., Ltd., et al.,

Defendants.

EXHIBIT W

(Feitian's e-mails to RF Ideas requesting sales information)

Aladdin Knowledge Systems, Ltd.,

Plaintiff,

V.

CIVIL ACTION NO. 05-149 (GMS)

Feitian Technologies Co., Ltd., et al.,

Defendants.

EXHIBIT X

(Feitian's 3/13/03 e-mail re: RSA Conference)

Aladdin Knowledge Systems, Ltd.,

Plaintiff,

v.

CIVIL ACTION NO. 05-149 (GMS)

Feitian Technologies Co., Ltd., et al.,

Defendants.

EXHIBIT Y

(RF Ideas' customer information and sales reports)

Aladdin Knowledge Systems, Ltd.,

Plaintiff,

v.

CIVIL ACTION NO. 05-149 (GMS)

Feitian Technologies Co., Ltd., et al.,

Defendants.

EXHIBIT Z

(RF Ideas' purchase orders, invoices, packing lists and related e-mails)

Aladdin Knowledge Systems, Ltd.,

Plaintiff.

v.

CIVIL ACTION NO. 05-149 (GMS)

Feitian Technologies Co., Ltd., et al.,

Defendants.

EXHIBIT AA

(Feitian's e-mails to RF Ideas forwarding leads)

Aladdin Knowledge Systems, Ltd.,

Plaintiff,

v.

CIVIL ACTION NO. 05-149 (GMS)

Feitian Technologies Co., Ltd., et al.,

Defendants.

EXHIBIT BB

(Feitian's 6/28/04 e-mail notifying RF Ideas of other U.S. distributor, AZ-Tech)

Aladdin Knowledge Systems, Ltd.,

Plaintiff.

v.

CIVIL ACTION NO. 05-149 (GMS)

Feitian Technologies Co., Ltd., et al.,

Defendants.

EXHIBIT CC

(Feitian's e-mails to customers with contact information for U.S. distributors)

Aladdin Knowledge Systems, Ltd.,

Plaintiff,

v.

CIVIL ACTION NO. 05-149 (GMS)

Feitian Technologies Co., Ltd., et al.,

Defendants.

EXHIBIT DD

(Feitian's 9/28/04 e-mail to RF Ideas forwarding U.S. leads from Feitian's Malaysian distributor)

Aladdin Knowledge Systems, Ltd.,

v.

Plaintiff,

CIVIL ACTION NO. 05-149 (GMS)

Feitian Technologies Co., Ltd., et al.,

Defendants.

EXHIBIT EE

(E-mails directed by Feitian to RF Ideas from potential Feitian customers)

Aladdin Knowledge Systems, Ltd.,

Plaintiff,

v.

CIVIL ACTION NO. 05-149 (GMS)

Feitian Technologies Co., Ltd., et al.,

Defendants.

EXHIBIT FF

(Invoice #030314 and related e-mails re; RF Ideas' stock of Feitian products)

Aladdin Knowledge Systems, Ltd.,

Plaintiff,

v

CIVIL ACTION NO. 05-149 (GMS)

Feitian Technologies Co., Ltd., et al.,

Defendants.

Defendants.

EXHIBIT GG

(Invoices and e-mails reflecting Feitian's shipments to Illinois)

Aladdin Knowledge Systems, Ltd.,

Plaintiff,

v.

CIVIL ACTION NO. 05-149 (GMS)

Feitian Technologies Co., Ltd., et al.,

Defendants.

EXHIBIT HH

(RF Ideas' documents re: sales of Feitian products to Illinois residents)

Aladdin Knowledge Systems, Ltd.,

Plaintiff,

v.

CIVIL ACTION NO. 05-149 (GMS)

Feitian Technologies Co., Ltd., et al.,

Defendants.

EXHIBIT II

(RF Ideas' shipments from Illinois to Feitian)

Aladdin Knowledge Systems, Ltd., Plaintiff,

v.

CIVIL ACTION NO. 05-149 (GMS)

Feitian Technologies Co., Ltd., et al.,

Defendants.

EXHIBIT JJ

Table C-5.
U.S. District Courts—Median Time Intervals From Filing to Disposition of Civil Cases Terminated, by District and Method of Disposition, During the 12-Month Period Ending September 30, 2005

	Tota	Total Cases	No Court Action	t Action			Cour	Court Action		
					Before	Before Pretrial	During or	During or After Pretrial	Trial	81
		Median		Median	Nimber	Median Time interval	Number	Median Time interval	Number	Median Time interval
Circuit and District	of Cases	In Months	of Cases	In Months	of Cases	in Months	of Cases	in Months	of Cases	in Months
TOTA:	208 380	9.5	49,579	7.0	134,527	9.5	20,711	13.1	3,563	21.8
				ı		1	3	, ,	i ii	34.0
DC	2,020	10.8	871	9.9	1,079	10.5	3/	17,4	g	01:0
	1	2	1 222	7.3	2.491	9.2	1,006	14.6	158	23.2
1ST	5,543	10.0	1,000	л : o d	225	7.9	19	17.4	9	
ME	420		200	ວ່າ	081	9.4	409	14.0	81	28.0
MA	669'7		0.77	<u>م</u> د	136	5.4	211	15.1	10	16.0
ZI	430	o c.	83 6	4 ·	220	7.4	208	11.8	18	19.0
PR R	1,460	11.5	332	8.2	929	10.8	159	17.6	40	24.7
	2000	10.3	6.262	7.4	9,255	9.6	2,462	15.7	354	28.9
SNU	1 050	11.4	1.292	9.8	540	14.4	50	25.2	68	32.4
C -	1 075	12.0	252	7.7	531	9.0	254	16.7	38	28.5
27,2	5.357	11.6	746	5.1	3,697	10.7	815	19.5	. 99	32.0
2 - T	8.362	8.8	3,552	7.5	3,521	7.4	1,164	12.9	120	À 0.0
NY W	1,244	10.2	381	6.7	670	9.0	177	21.0	o ö	#2.0
VT	345	7.3	39	4.2	296	7.7	ĸ	,	c	1
	24.036	A.	4.715	ភ ភ	16,050	2.8	2,911	12.2	360	21.2
3RD	1 053	10.9	161	8.0	833	10.8	22	13.0	37	26.5
	5 305	7.3	1,810	6.2	1,933	5.3	1,504	13.8	58	27.0
	13.398	1.0	1,230	4.7	10,816	1.0	1,192	11.8	160	22.7
יר מ איר מ	1.733	7.5	607	4.5	978	7.3	95	17.0	5 8	3 10 0
) A A S	2,298	9.0	868	8.0	1,295	9.4		20.0	, ,	
S	249	21.0	39	4.5	195	24.0	ö	23.0	•	
) 1 2 3	9	4 077	7 л	29.487	9.8	2,138	21.0	219	17.2
4TH	3 506	я.	1.461	8.5	1,777	7.4	225	14.9	43	22.0
3	895	11.7	291	9.8	591	11.1		•	12	22.0
Z C, in	764	12.6	220	8.0	351	13.0	184	1 3 3	<u>د</u> رر	34 -
NC, M	838	10.9	289	9.2	478	10.7	60	3 3 3	: -	24.0
NC,W	22 784	9.0	343	6,2	21,288	9.0	1,105	46.7	7 48 0 8	40.7
SC	3 204	ნ .ა	1,109	4.9	1,516	5.6	520		. J. S	3 .
VΛ, π	880	9.4	181	8.0	662	9,6	19	12.5	. č	
W/V N	484	12.0	130	9.6	333	13.4	. i	30.0	<u>.</u>	16.0
WV s	2,566	18.8	53	11.0	2,491	18.3	11	20.0	=	i
, o	1									

Table C-5. (September 30, 2005—Continued)

	Tota	Total Cases	No Cou	No Court Action				Court Action		
					Before	Before Pretrial	During or	During or After Pretrial	Trial	al
	Number	Median Time interval	Nii m	Median Time interval	Number	Median Time interval	Number	Median Time Interval	Number	Median Time Interval
Circuit and District	of Cases	in Months	of Cases	in Months	of Cases	in Months	of Cases	in Months	of Cases	in Months
							,	***************************************	***************************************	***************************************
5TH	19,784	9.8	5,143	8.6	12,256	9.6	1,934	13.5	451	19.8
LA,E	2,375	9.6	33	2.2	1,385	6.0	871	13.8	86	19.0
LA,M	674	11.8	47	3.5	. 608	11.7	Ch:		14	21.0
LA,W	1,811	12.4	650	9.5	1,068	13.7	51	19.0	42	21.6
MS,N	944	10.6	184	7.5	658	10.1	79	16.8	23	16.7
MS,S	2,813	11.9	1,895	9.5	865	12.5	12	17.5	41	22.7
TX,N	3,054	8.6	177	7.0	2,793	7.0	7	•	77	20.3
TX,E	1,704	10.3	339	5.0	1,227	11.6	92	13.0	46	16.5
TX,S	4,270	9.8	1,267	6.8	2,132	8.2	798	12.0	73	16.6
TX,W	2,139	9.3	551	B,3	1,520	9.0	19	11.5	49	21.0
6TH	17,274	9.9	3,840	6.1	10,011	9.5	3,132	13.4	291	23.3
KY,m	1,794	10.7	124	5.7	1,638	10.0	19	18.0	13	25.0
KY,W	1,259	11.0	259	7.0	876	11.6	112	18.3	12	25.0
MI,E	3,677	9.9	546	4.6	1,505	6.2	1,550	13.0	76	25.3
MI,W	962	9.0	109	3.3	818	9.7	22	16.3	13	13.0
OH,N	3,539	6.3	942	5.4	1,843	6.0	714	10.5	40	19.4
OH,S	2,420	11.3	1,014	8.7	1,034	12.2	335	16.1	37	27.4
TN,E	1,294	11.2	284	8.5	619	9.5	357	16.9	34	24.0
TN,M	1,366	12.1	257	11.8	1,071	12.6	i G		32	19.0
TN,W	963	10.7	305	7.8	607	11.2	17	20.0	34	22.5
7 TH	13,852	7.1	3,877	5.8	8,206	7.0	1,520	12.3	249	23.7
	6,979	6.9	2,321	5.8	4,020	5.0	529	12.0	109	24.7
IL,C	746	8.6	324	8.8	398	8.6	8	•	16	23.0
IL,S	853	9.5	265	6.6	545	9.4	23	18.0	20	24.0
N,N	1,402	10.6	291	5.6	631	9.7	445	14.4	35	23.0
IN,S	2,319	10.4	482	5.5	1,553	11.5	255	14.0	29	22.0
WI,E	1,046	9.1	164	4.8	817	10.4	58	13.4	17	25.5
WI,W	507	4.4	40	2.8	242	3.6	202	6.4	23	9.5
8TH	12,016	9.8	3,992	7.9	6,573	9.1	1,129	12.4	322	20.4
	1,707	11.5	386	10.8	1,253	11.4		15.0	57	19.7
AR,W	924	12.0	18	11.0	871	12.0	4	•	31	13.7
IA,N	415	10.5	64	8.5	326	10.7	7	•	18	20.0
IA,S	666	10.9	140	7.8	456	10.7	51	18.6	19	20.7
MZ.	3,519	7.5	1,758	7.2	753	7.7	961	11.0	47	24.4
MO,E	1,896	8.1	600	8.2	1,250	8.8	4		42	19.8
MO,W	1,652	9.4	732	8.0	853	9.7	29	18.5	38	21.8
NE .	688	9.0	27	1.0	579	8.3	43	17.4	39	19.5
ND	234	7.3	63	4.8	158	7.8	ω	•	10	16.0
SD	315	11.4	204	9.5	74	10.7	16	21.5	21	24.0

Table C-5. (September 30, 2005—Continued)

Total Cases

No Court Action

Before Pretrial

During or After Pretrial

Trial

Court Action

	Number	Median Time Interval	Number	Median Time interval	Number	Median Time Interval	Number	Median Time Interval	Number	Medlan Time interval	
Circuit and District	of Cases	in Months	of Cases	In Months	of Cases	in Months	of Cases	in Months	of Cases	in Months	11
	24 284	8 9	10 646	7.4	18 147	8.0	1.973	13.2	495	23.7	
AK	296	9.2	16	7.0	275	9.6	•	•	Cri	•	
AZ	2,200	10.2	746	10.9	1,394	10.5	8	ı	52	28.8	
CAN	4.490	9.8	1,863	6.4	998	7.8	1,572	12.7	57	26.0	
CALE	2.397	10.7	885	8.4	1,478	11.5	2	•	32	26.0	
ca.c	10,773	7.4	4,611	6,5	5,889	7.8	122	17.3	151	22.0	
CA.S	1,889	ნ.ა	135	3.3	1,739	7.6			15	27.5	
≖ :	644	10.9	291	9.8	271	9.7	66	14.6	16	25.0	
.	464	11.5	85	4.2	324	11.6	43	17.5	12	20.0	
MT	479	12.8	99	11.5	277	9,3	86	16.5	17	24.0	
N	1,795	8.9	356	6.7	1,420	9.0		ı	19	25.0	
OR	1,892	10.6	559	8.1	1,259	11.8	12	18.0	62	20.4	
WA,E	660	8.7	261	7.6	360	8.2	32	16.0	7		
WA,W	3,203	9.6	725	5,5	2,411	10.4	20	18.8	47	19.8	
GUAM	45	20.0	12	13.0	20	17.0	10	23.0	ယ	•	
NMI	34	9.4	N	•	32	10.0		1	,	ř	
10TH	8,224	9.8	1,175	6.3	5,513	8.8	1,273	12.1	263	19.5	
CO	1,991	8.3	40	3.5	1,724	7.1	159	20.6	68	28.0	
KS	1,186	9.7	359	7.7	688	8.0	96	18.7	43	19.4	
NM	1,309	10.3	97	7.0	661	8.8	490	12.0	61	18.0	
OK,N	667	10.8	56	3.3	580	10.0	10	20.0	21	19.5	
OK,E	429	8.3	67	6.8	314	9.0	30	9,5	- 13 65	13.5	
OK,W	1,250	8.3	394	5.4	481	7.3	350	10.4	25	15.5	
UT .	1,122	11.4	61	7.4	1,031	11.6	13	19.0	17	27.0	
WY	270	9.8	101	5.0	34	9.0	125	10.7	10	13.0	
11TH	20,116	8.1	3,093	7.1	15,459	7.0	1,196	13.9	368	18.8	
	3,029	7.4	824	9.1	2,137	4.5	22	22.0	46	19.0	
AL.M	796	9.5	236	7.9	492	9.5	41	14.0	27	18.0	
ALS	636	8.1	104	6.0	496	8.4	19	16.4	17	15.5	
Tr.N	781	8.8	202	7.4	561	8.4	14	13.0	4	•	
FLM	5,019	8.3	686	5.5	4,140	9.9	86	16.2	107	18.2	
FLS	5,012	6,6	60	2.2	4,546	5.4	327	10.9	79	16.0	
GA.N	3,589	10.0	734	6.9	2,123	9.7	673	13.8	59	24.5	
GA,M	746	10.2	166	7.0	549		10	17.0	21	22.0	
GA,S	508	9.1	81	5.7	415	9.6	4		œ	•	
!!											
GA, S	OCC STORY	S. I	מספה מהססת	THIS TABLE	EXCLUDES LAN	D CONDEMNATION	S. PRISONER PE	TITIONS, DEPORTA	TION REVIEWS, I	RECOVERY OF	
NOTE: MEDIAN TIME INTERVALS NOT COMPUTED WHEN FEWER THAN 10 CASES REPORTED. THIS TABLE EXCLUDES LAND CONDEMNATIONS, PRISONER PETITIONS, DEPORTATION REVIEWS, RECOVERY OF OVERPAYMENTS AND ENFORCEMENT OF JUDGMENTS. OVERPAYMENTS, AND ENFORCEMENT OF JUDGMENTS. FOR FISCAL YEARS PRIOR TO 2001, THIS TABLE INCLUDED DATA ON RECOVERY OF OVERPAYMENTS AND ENFORCEMENT OF JUDGMENTS.	OT COMPUTED WH	IEN FEWER THAN 10 'S. FOR FISCAL YEAR	CASES REPORT RS PRIOR TO 20	TED. THIS TABLE 01, THIS TABLE IN	EXCLUDES LAN	D CONDEMNATION ON RECOVERY OF	S, PRISONER PE OVERPAYMENT	TITIONS, DEPORTA S AND ENFORCEME	ATION REVIEWS, I	RECOVERY OF ITS.	